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February 6, 2006

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Impsat USA, Inc., Certification of CPNI Filing (February 6, 2006)

EB Docket Nos. 06-36, EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Commission's Public Notices issued January 30, 2006 and February 2, 2006 in the above-captioned proceedings, Impsat USA, Inc. submits the attached Statement of Operating Procedures and Certification of compliance with the Commission's customer proprietary network rules.

If you have questions regarding this matter, please contact the undersigned at (202) 637-2120.

Sincerely,



Jeffrey A. Marks

Enclosures

Impsat USA, Inc.
Statement of Operating Procedures

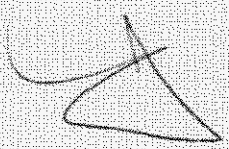
Impsat USA, Inc. ("Impsat") employs the following procedures to ensure that it is in compliance with the Commission's customer proprietary network information ("CPNI") rules, 47 C.F.R. §§ 64.2001-64.2009.

Impsat's policy is to *not* use CPNI at all for marketing purposes. This policy is reinforced through: (1) Impsat's written Code of Ethics; and (2) Impsat's and its sales team's contractual obligations to keep customer information confidential.

Specifically, Impsat has in place a written Code of Ethics that, among other things, sets forth Impsat's policies related to use of customer information. The Code of Ethics establishes that all customer information is proprietary and may not be used for marketing purposes. All employees are instructed to keep customer information confidential, and are required review the Code of Ethics and certify by their signature that they will uphold the provisions therein. In addition, all members of Impsat's sales force must sign a confidentiality agreement related to customer information.

Further, Impsat provides service exclusively to business customers and other carriers on an individual contract basis. *Impsat has no residential customers and does not market to residential customers.* It is Impsat's practice that customer contracts include a confidentiality provision whereby Impsat is contractually obligated to not disclose customer information. This provision ensures that Impsat will not use such information for marketing purposes. Impsat ensures that its employees are made aware of, and comply with, Impsat's confidentiality obligation to its customers.

Impsat has established a supervisory review process to ensure compliance with the aforementioned confidentiality policies and with Commission rules. This process includes officer certification of Impsat's steps to ensure compliance, in conformance with 47 C.F.R. § 64.2009(e).



Certification

I, Federico Lammell, certify under penalty of perjury that I am the Vice President of Sales & Services of Impsat USA, Inc. ("Impsat"), that I have personal knowledge that Impsat has established the practices and policies described in the foregoing Statement of Operating Procedures and that those practices and policies are adequate to ensure compliance with 47 C.F.R. §§ 64.2001-64.2009, to the best of my information, knowledge and belief.

Executed on February 6, 2006.



Federico Lammell
Vice President of Sales & Services